

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CR. NO. 3:22-CR-*3de*
: :
v. : (Judge *Mannion*)
: :
ROBERT MAVERICK VARGO, :
: :
Defendant. : :

I N D I C T M E N T

FILED
SCRANTON

OCT 18 2022

THE GRAND JURY CHARGES:

PER *Jm*
DEPUTY CLERK

COUNT 1

18 U.S.C. § 871

(Threats Against the President of the United States)

On or about October 11, 2022, in Luzerne County, in the Middle District of Pennsylvania, and elsewhere, the defendant,

ROBERT MAVERICK VARGO,

did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon the President of the United States, specifically, the defendant mailed a letter in which he threatened to kill the President.

In violation of Title 18, United States Code, Section 871.

THE GRAND JURY FURTHER CHARGES:

COUNT 2

18 U.S.C. § 875(c)

(Interstate Communications with Threat to Injure)

On or about October 11, 2022, in Luzerne County, in the Middle District of Pennsylvania and elsewhere, the defendant,

ROBERT MAVERICK VARGO,

knowingly and willfully did transmit in interstate and foreign commerce from Wilkes-Barre, Pennsylvania to Washington, D.C. a letter to Representative Bennie Thompson, and the communication contained a threat to kill Representative Bennie Thompson, his family, the President of the United States, and U.S. District Court Judge Robert Mariani.

In violation of Title 18, United States Code, Section 875(c).

THE GRAND JURY FURTHER CHARGES:

COUNT 3

(18 U.S.C. 115(a)(1)(B) and (b)(4))

(Influencing, Retaliating Against a Federal Official by Threat)

On or about October 11, 2022, in Luzerne County, in the Middle District of Pennsylvania, and elsewhere, the defendant,
ROBERT MAVERICK VARGO,
did threaten to murder Congressman Bennie Thompson, a United States Representative for Mississippi, and his immediate family, with intent to impede, intimidate and interfere with Representative Thompson while he was engaged in his performance of his official duties.

In violation of Title 18, United States Code, Section 115(a)(1)(B) and (b)(4).

A TRUE BILL

GERARD M. KARAM
United States Attorney

[REDACTED]
FOREPERSON

Jenny P. Roberts
JENNY P. ROBERTS
Assistant United States Attorney

2022 Oct 18
Date